Dear Senator East.

My name is Mary Vann Sitton and I am a retired Child Nutrition Director. I served child nutrition programs in Hertford, Durham, and Wilson counties in addition to a five year assignment as the Training Consultant (1987 - 1992) for Child Nutrition Services at the Dept of Public Instruction. I also was a classroom teacher for the first six years of my career.

SB 389 concerns me greatly as I believe strongly that school meals are an integral part of a child's learning and essential to the success of children at school. The majority of the CN Director's I have spoken to across the state share my concern. On the surface, some might look at the bill and say, "Why not?"

I would like to provide a few of the reservations I have concerning SB 389:

- (1) ADMINISTRATION Unless I'm mistaken, there is NO evidence to support that the Dept of Public Instruction has been re-miss in administration of the child nutrition programs under their umbrella. According to a USDA memo concerning the findings of the last USDA Management Evaluation of the Child Nutrition Program at DPI (2009), the evaluation was closed and all issues were resolved. Apparently, USDA doesn't have any issues with the way the federal program is currently administered by DPI and has been for the past 60+ years. Why would our legislators have an issue?
- (2) CHAIN OF COMMAND ALL of us who work in public schools share the same

chain of command. It goes: State Board of Educ to Dept of Public Instruction to Local School Board to Superintendent to Principals and Program Administrators to Teacher to Students. For Child Nutrition Administrators, add USDA federal reg's and guidelines at the beginning of the chain. How will a move to NCDACS affect the Chain of Command? In my opinion, not too well. It is ALWAYS best to have groups of people who work together to be responsible to the same Chain of Command - they at least have that commonality and sense of purpose. Child Nutrition Services DOES NOT need to be taken out of the Chain of Command that provides

the respect and authority central to ALL school administrators.

- (3) FINANCIAL INTEGRITY: The Financial Offices of all school districts feed to the Dept of Public Instruction. Ability to review, track and administer federal funding from the local level to the state level is integral to program integrity. How can NCDACS interface with DPI to track local child nutrition federal funding?
- (4) EFFORTS: How many surveys and how much research was conducted by the

legislature to look at the pros and cons this potential move? If consolidation of effort is the goal, was there a feasibility study to look at the potential savings of moving the current NCDACS Food Distribution Services to the Dept of Public Instruction for program administration? They are a MUCH smaller staff and the fall-out/impact of moving Food Distribution to the Dept of Public Instruction would seem considerably less disruptive. After all, it is my understanding that in 31 of the 50 states in U.S., the Dept of Education administers BOTH the federal child nutrition program and the USDA food distribution program. Why would our state be looking at consolidation efforts to go to just the OPPOSITE of what the majority of states consider the economical way to administer both these programs?

(5) COST: Is there any logistic study on the financial cost to move Child Nutrition from DPI to NCDACS? As I see it, the cost would be EXCESSIVE. In a time of state financial crisis I don't see how our legislature can support such a move, and WHO pays? And, why do it anyway?

I could go on and on, but I hope you will take the time to review my concerns and let me know the answers to my questions that will provide me understanding as to why you believe this move is the best for child nutrition programs in our state. As I said at the beginning, on the surface this may appear as simple as picking up the staff and the supplies and moving them down the street. I assure you, such a move would be expensive, time consuming and de-moralizing for all concerned.

Sincerely,

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